

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES

v.

SAJJU KHATIWADA

Case No. 24-MJ-1277

JUDGE HOLMES

UNITED STATES' MOTION FOR DETENTION HEARING
AND FOR DETENTION OF THE DEFENDANT

The United States of America, by and through Acting United States Attorney Thomas J. Jaworski, and Assistant United States Attorney Kathryn Booth, and moves this Court for a detention hearing and for detention of the Defendant in this matter. Federal law holds that “the judicial officer shall hold a hearing to determine whether any conditions or combination of conditions...will reasonably assure...the safety of any other person and the community – upon motion of the attorney for the Government or upon the judicial officer’s own motion in a case, that involves...any felony...that involves ... a serious risk that such person will flee.” 18 U.S.C. § 3142(f)(2)(A).

The statement in support of the Criminal Complaint in this case describes that the Defendant was born in Nepal and is currently a permanent U.S. resident. The United States has learned that the Defendant maintains ties to Nepal, including having parents who reside there, and that he travels to Nepal approximately once per year. Moreover, the Defendant has access to large sums of money that could be used to effectuate his flight. According to the Complaint, the Defendant orchestrated a scheme to defraud Bridgestone out of nearly \$15 million over the course of approximately four years, which involved making numerous monetary transfers among over a dozen bank accounts. Thus, he has access to large amounts of funds in both known and possibly

also unknown bank accounts. Further, he faces up to 20 years in prison on the wire fraud count and up to 10 years on the money laundering count; his Sentencing Guidelines are likely to be high due to the large loss amount. This exposure increases his motive to flee prosecution.

Therefore, the Court should set a detention hearing based on the fact that, statutorily, the Government is entitled to one on their own motion in this case. The United States respectfully requests a continuance of three business days in order to adequately prepare for the hearing in this matter. Respectfully submitted,

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